

## **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

## **REGION IX**

## 75 Hawthorne Street San Francisco, CA 94105-3901

May 14, 2015

Tay Dam Federal Highway Administration 888 S. Figueroa Street, Suite 1850 Los Angeles, CA 90017-5467

Subject:

EPA comments on the Final Environmental Impact Statement for Mid County Parkway,

Riverside County, California (CEQ # 20150114)

Dear Mr. Dam:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (EIS) for the Mid County Parkway (MCP) in Riverside County, California. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act. The Federal Highway Administration (FHWA), Caltrans, and Riverside County Transportation Commission (RCTC) have prepared this Final EIS to improve east-west transportation in western Riverside County between Interstate 215 in the west and State Route (SR) 79 in the east. As described in the Final EIS, three alternatives were evaluated, generally following a northern (Alternative 4 Modified), central (Alternative 5 Modified), and southern (Alternative 9 Modified) alignment through the city of Perris and continuing east on a route parallel to the existing Ramona Expressway. The Final EIS identifies the Preferred Alternative as Alternative 9 Modified with the San Jacinto River bridge design variation.

EPA provided comments on the Supplemental Draft EIS on April 5, 2013, rating the proposed project as *Environmental Concerns-Insufficient Information (EC-2)*. The project has followed the National Environmental Policy Act and Clean Water Action Section 404 Integration Process for Federal Aid Surface Transportation Projects in California Memorandum of Understanding (NEPA/404 MOU). EPA participates on the MCP Resource Agency Coordination (RAC) team which provides an interagency forum for early feedback during project development and facilitates the NEPA/404 MOU process. EPA has provided agreement on the project's revised purpose and need statement (July 21, 2010), agreement on the modified range of alternatives (January 31, 2011), and agreement on the preliminary Least Environmentally Damaging Practicable Alternative (LEDPA; February 10, 2014), as well as comments on the Administrative Final EIS and several revised draft technical documents which support the Final EIS.

In our comments on the Supplemental Draft EIS we expressed concerns with the project's impacts to the San Jacinto River floodway from the San Jacinto River Bridge Design Variation and the Perris Valley Storm Drain channel from the Alternative 4 Modified bridge that parallels the channel. EPA also recommended utilizing a watershed approach to identify the most beneficial opportunities to mitigate for impacts to Waters of the U.S., and provided comments regarding minimization of neighborhood impacts,

tribal coordination, and the use of U.S. EPA Tier 3 and Tier 4 construction equipment to further reduce construction emissions. We appreciate the extensive analysis and coordination which have taken place to address our comments, as well as the changes and additional mitigation measures which have been committed to in the Final EIS. Additionally, we appreciate the comprehensive analysis of Climate Change and quantification of Greenhouse Gas (GHG) emissions provided in the Final EIS, including discussions of climate change mitigation and GHG reduction strategies. Given the nature of the project, we understand that it may not be possible to mitigate for all vehicular GHG emissions; however, we recommend that the Record of Decision (ROD) include a discussion of specific measures from the Regional Transportation Plan/Sustainable Communities Strategy (as referenced on pages 4-51 and 4-135) that have been identified for their potential to reduce regional GHG emissions and offset project-related GHG increases.

Based upon the information presented in the Final EIS, and the identification of Alternative 9 Modified as the preferred alternative and preliminary LEDPA, EPA's concerns with the project have been addressed. We commend FHWA, Caltrans, and RCTC for working so extensively with the public and resource agencies to identify a Preferred Alternative for MCP that best balances community needs and concerns with protection of the environment. EPA appreciated the regular and proactive engagement with resource agencies to provide project updates, elicit agency concerns, and provide supplemental analyses and project refinements when needed. We hope that the MCP RAC team will serve as a national example of successful interagency coordination.

We note that we are available for additional coordination regarding mitigation for MCP project impacts, and we look forward to working with the MCP RAC team to finalize the project's compensatory mitigation plan.

We appreciate the opportunity to review this Final EIS and look forward to working with FHWA, Caltrans, and RCTC during development of future projects and mitigation discussions. When the ROD is signed, please send one copy to the address above (mail code: ENF 4-2). If you have any questions, please contact me at 415-947-4161 or Clifton Meek, the lead reviewer for this project. Clifton can be reached at 415-972-3370 or meek.clifton@epa.gov.

Sincerely,

Connell Dunning, Transportation Team Supervisor

Environmental Review Section

Connell Cunning

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